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October 28, 2021

VIA ECF

Hon. Denise L. Cote
United States District Court
Southern District of New York
500 Pearl Street, Room 1910
New York, NY 10007

Re: *Integrated Media Resources, LLC v. Morley et al*, Docket No. 1:21-cv-
04993

Dear Judge Cote:

We write on behalf of Nominal Defendants G2 FMV, LLC and G2 Investment Group, LLC and Defendant Jonathan Todd Morley (“Defendants”) in the above-referenced action. Pursuant to Rule 4.F of Your Honor’s Individual Practices in Civil Cases, we write to respectfully request oral argument on Defendants’ Motion to Dismiss Plaintiff’s Complaint filed on August 30, 2021.

Although we recognize that pursuant to Rule 6 of Your Honor’s Special Rules of Practice in Civil Pro Se Cases, “[u]nless otherwise ordered by the Court, oral argument will not be heard in pro se matters,” we understand that the only pro se party in this case, Defendant Dori V. Karjian, is in the process of obtaining counsel. We submit oral argument would be appropriate even if Mr. Karjian is pro se because we do not believe Mr. Karjian would be a material part of the oral argument. While we cannot speak for Mr. Karjian, we do not anticipate that Mr. Karjian would wish to or need to participate in oral argument given the issues in the case. We will advise the Court should Mr. Karjian obtain counsel.

Thank you for your consideration of this matter.

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Respectfully submitted,

/s/ Howard Schiffman

Howard Schiffman

cc: Counsel of Record (via ECF)